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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

JANET DOE,

Case No. 6:24-cv-00801-MC

Plaintiff,

STIPULATED RULE 502(d) ORDER

v.

UNITED STATES OF AMERICA;

SHAWN GUTIERREZ, an

individual; GEORGE FOX

UNIVERSITY,

Defendants.

It is hereby stipulated and agreed by and between the respective parties hereto by their counsel of record that:

1. The production of privileged or work-product protected documents, electronically stored information (“ESI”) or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).
2. Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

DATED: January 8, 2025

/s/ Rhett G. Fraser
Rhett G. Fraser, OSB No. 091080
Huegli Fraser Law

/s/ Barbara C. Long
Barbara C. Long, OSB No. 122428
Long Law PC
Attorneys for Plaintiff

DATED: January 8, 2025

Natalie K. Wight
United States Attorney
District of Oregon

/s/ Michael Jeter
Michael Jeter, OSB No. 165413
Attorneys for Defendant United States of America

DATED: January 8, 2025

/s/ Melisa A. Button

Melisa A. Button, OSB No. 116113
Hornecker Cowling LLP
*Attorney for Defendant George Fox
University*

DATED: January 8, 2025

/s/ Guy E Keating

Guy E Keating, OSB No. 074367
Schulte Anderson
*Attorney for Defendant Shawn
Gutierrez*

IT IS SO ORDERED.

DATED: 1/31/2025

s/Michael J. McShane

Judge Michael J. McShane
United States District Court Judge